

CERTIFICATE OF COMPLIANCE


Case No. 23-12

Caption: Kowal v. Ferndale Area School District,
et al.

As required by Supreme Court Rule 33.1(h),
I certify that the document contains 1,915 words,
excluding the parts of the document that are
exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the
foregoing is true and correct.

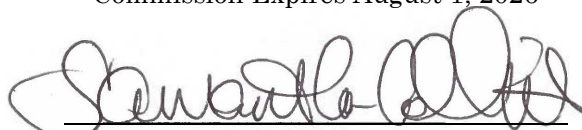
Executed on September 5, 2023.



Carolyn Adkins
Record Press, Inc.

Sworn to before me on
September 5, 2023

Samantha Collins
Notary Public, State of New York
No. 01CO6437788
Qualified in Kings County
Commission Expires August 1, 2026



Notary Public